

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

JOHN DOE c/o Laffey, Bucci, D’Andrea, Reich & Ryan LLP Plaintiff, v. WILLIAMSPORT AREA SCHOOL DISTRICT, et. al. Defendants.	CIVIL ACTION NO. 4:22-CV-01387-MWB
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JOINT MOTION FOR EXTENSION OF DISCOVERY DEADLINES

NOW COMES, Plaintiff, by and through his counsel LAFFEY BUCCI D’ANDREA REICH & RYAN LLP, and hereby moves the Court for an Order extending deadlines in this matter for the purpose of completing discovery. In support thereof, the undersigned counsel states the following:

1. On or about January 17, 2024, the Court entered a Scheduling Order in this matter. (Doc. 130).
2. The January 17, 2024, Scheduling Order set forth a fact discovery deadline of September 2, 2024, and further that all request for extensions of this deadline shall be made at least fourteen days before the expiration of the discovery period.
3. The parties have worked cooperatively to exchange written discovery and documents and to schedule and conduct depositions in this matter; however, additional time is needed for further discovery and depositions in this matter.
4. Counsel have scheduled Plaintiff’s deposition for August 22, 2024, and are working to schedule remaining depositions in this matter.
5. Counsel for Defendants for Williamsport Area School District, consent to this motion and to the dates set forth in the accompanying Proposed Order.

6. This application is the first such request for extension of discovery deadlines in this matter and is made in advance of the deadline to do so.

7. Granting this request for an extension of discovery deadlines will not prejudice any party in this matter.

WHEREFORE, Plaintiff respectfully requests that his Court grant this joint motion and enter the order submitted herewith.

Respectfully Submitted,

/s/ Michael J. McFarland

Gaetano D'Andrea, Esq.

Michael J. McFarland, Esq.

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By consent:

/s/ Megan Hazel

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Dated: July 31, 2024

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CERTIFICATE OF CONCURRENCE

I, the undersigned, Michael J. McFarland, Esq., counsel for Plaintiff John Doe, sought concurrence from Megan Hazel, Esq., counsel for Defendant Williamsport Area School District, on July 31, 2024, and was advised that Defendant concurs in this motion.

/s/ Michael J. McFarland

Gaetano D'Andrea, Esq.

Michael J. McFarland, Esq.

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that all counsel of record who are deemed to have consented to electronic service are being served with a true and correct copy of this document via the Court's CM/ECF system, pursuant to the Federal Rules of Civil Procedure.

/s/ Michael J. McFarland

Gaetano D'Andrea, Esq.

Michael J. McFarland, Esq.

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Date: July 31, 2024